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7							
8	UNITED STATES DISTRICT COURT						
9	NORTHERN DISTRICT OF CALIFORNIA						
10							
11	EIJI KURIHARA individually, and on behalf of all others similarly situated,	Case No. C06-01884 MHP					
12	Plaintiffs,	STIPULATION AND [PREGARDING BEST BU					
13	V.	DATA DATA					
	v •						
14	REST BUY CO INC	Action Filed: March 10, 20					
14 15	BEST BUY CO., INC.,	Action Filed: March 10, 20 Trial Date: None Set					
	BEST BUY CO., INC., Defendant.						
15							
15 16	Defendant.	Trial Date: None Set					
15 16 17	Defendant. WHEREAS, Best Buy possesses p	Trial Date: None Set					
15 16 17 18	Defendant. WHEREAS, Best Buy possesses p current employees, including their names, re	Trial Date: None Set ersonal and private informatesidential home addresses, he					
15 16 17 18 19	Defendant. WHEREAS, Best Buy possesses p current employees, including their names, retax information, and social security numbers.	ersonal and private informatesidential home addresses, he					
15 16 17 18 19 20	Defendant. WHEREAS, Best Buy possesses p current employees, including their names, re tax information, and social security numbers: WHEREAS, Plaintiff served disc	ersonal and private informatesidential home addresses, he and sovery the compliance with					
15 16 17 18 19 20 21	Defendant. WHEREAS, Best Buy possesses p current employees, including their names, re tax information, and social security numbers: WHEREAS, Plaintiff served disc production or disclosure in this litigation	ersonal and private informatesidential home addresses, he and sovery the compliance with					
15 16 17 18 19 20 21 22	Defendant. WHEREAS, Best Buy possesses p current employees, including their names, retax information, and social security numbers: WHEREAS, Plaintiff served disconnection or disclosure in this litigation former and current employees; and	ersonal and private informates desidential home addresses, he and and private with the compliance with the personal and private information.					
15 16 17 18 19 20 21 22 23	WHEREAS, Best Buy possesses p current employees, including their names, retax information, and social security numbers. WHEREAS, Plaintiff served disconnection or disclosure in this litigation former and current employees; and WHEREAS, the parties desire to face	ersonal and private informatesidential home addresses, howard and private informates and covery the compliance with of personal and private informates accilitate the exchange of informatical contents.					
15 16 17 18 19 20 21 22 23 24	Defendant. WHEREAS, Best Buy possesses p current employees, including their names, retax information, and social security numbers: WHEREAS, Plaintiff served disconnection or disclosure in this litigation former and current employees; and	ersonal and private informatesidential home addresses, howard the compliance with of personal and private informatesidential the exchange of information of the court, permit Best Buy to consider the court, permit					

PULATION AND [PROPOSED] ORDER GARDING BEST BUY EMPLOYEE ГΑ

n Filed: March 10, 2006

and private information of their former and al home addresses, home telephone numbers,

the compliance with which requires the sonal and private information of Best Buy's

e the exchange of information relevant to this ermit Best Buy to comply with its duty to its s employees by restricting disclosure of such personal and private information; and

> STIPULATION REGARDING BEST BUY EMPLOYEE DATA

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	WH	EREAS	S, the	e Parties	desire	to	protect	the	perso	onal	informatio	n of	Best	Buy's
emplo	yees	during	the p	ore-class	certific	atio	n period	bey	ond	the	provisions	of th	ne Stij	pulated
Protec	tive (Order ei	ntered	into by the	he Partie	es;								

NOW THEREFORE, the Parties, by and through their respective undersigned counsel of record, stipulate and agree to the following, which they mutually request the Court to make the subject of a Court Order:

- The private information of former or current Best Buy employees produced a.. by Best Buy in this action is CONFIDENTIAL INFORMATION subject to the Stipulated Protective Order.
- Until such time as a class is certified in this action, the personal h. information of former and current Best Buy employees produced to Plaintiff by Best Buy shall be viewed and used only by counsel for the putative class, counsel's employees, their investigators and experts pursuant to the Stipulated Protective Order, and not by the representative plaintiff.

Based on the foregoing considerations, **IT IS SO STIPULATED**.

Dated: December 8, 2006	ROBINS 1	KAPLAN	MILLER A	& CIRESI L.L.P.
Batea. Beecimeer 0, 2000	KODII 10, 1	IXAI LAIN,		X CINEDI E.E.I .

/s/ Hernaldo J. Baltodano By: Thomas A. Miller Hernaldo J. Baltodano Attorneys for Defendant BEST BUY CO., INC.

Dated: December 8, 2006 SCOTT COLE & ASSOCIATES, APC

By: _ _/s/ Mathew R. Bainer_ Scott Edward Cole Matthew R. Bainer Attorneys for Plaintiff EIJI KURIHARA

> STIPULATION REGARDING BEST BUY **EMPLOYEE DATA**

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[PROPOSED] ORDER

Good cause having been shown,

- a.. The private information of former or current Best Buy employees produced by Best Buy in this action is Best Buy's designated "CONFIDENTIAL INFORMATION" subject to the Stipulated Protective Order.
- b. Until such time as a class is certified in this action, the personal information of former and current Best Buy employees produced to Plaintiff by Best Buy shall be viewed and used only by counsel for the putative class, counsel's employees, their investigators and experts pursuant to the Stipulated Protective Order, and <u>not</u> by the representative plaintiff.

IT IS SO ORDERED.

Dated: December 13, 2006

